

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION

John Francis Medaglia, III,)	
)	
Plaintiff,)	NOTICE OF FILING BY DEFENDANT
)	CITY OF NEW ELLENTON
v.)	IN OPPOSITION TO PLAINTIFF'S SECOND
)	MOTION FOR SUMMARY JUDGMENT
Shawn Middleton;)	AND IN REPLY TO PLAINTIFF'S RESPONSE
City of New Ellenton,)	TO MOTION BY DEFENDANT CITY OF NEW
)	ELLENTON FOR SUMMARY JUDGMENT
Defendants.)	
_____)	Civil Action 1:24-cv-00532-MGL-SVH

In the interests of clarity and judicial economy, Defendant City of New Ellenton ("City") hereby responds and replies to ECF 60, docketed as Plaintiff's Motion for Summary Judgment *and* Response to City's Motion for Summary Judgment, by craving reference to City's Memorandum (ECF 54-1), filed on July 31, 2024, in support of City's Motion for Summary Judgment (ECF 54) and in opposition to Plaintiff's previously filed Motion for Summary Judgment (ECF 36). There is no substantive difference between ECF 36 and ECF 60, and ECF 54-1 sufficiently states City's positions on Plaintiff's and City's motions for summary judgment.

Respectfully submitted,

August 28, 2024

NESS & JETT, LLC

Bamberg, South Carolina

By: s/Norma A. T. Jett
Norma A. T. Jett, ID #5101
Post Office Box 909
Bamberg, SC 29003
(803)245-5178
normajett@gmail.com
ATTORNEY FOR DEFENDANT
CITY OF NEW ELLENTON